

AMY E. POTTER, OSB No. 231794

amy@angelilaw.com

ANGELI LAW GROUP LLC

121 SW Morrison Street, Suite 400

Portland, OR 97204

Telephone: (503) 954-2232

Facsimile: (503) 227-0880

MICHAEL BERTHOLF, OSB No. 044642

michaelbertholaw@gmail.com

Law Offices of Michael P Bertholf LLLC

108 Mistletoe St

Medford, OR 97501

Telephone: (541) 245-9167

Facsimile: (541) 773-6790

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

**EXHIBIT LIST WITH COURT
RULINGS AND UPDATED
OBJECTIONS TO NEW/UPDATED
EXHIBITS**

**NEGASI ISHAIAH ZUBERI, aka
JUSTIN JOSHUA HYCHE, aka SAKIMA
ZUBERI**

Defendant.

The defense originally provided objections to multiple government exhibits which the Court ruled on during the Pretrial Conference in August. That list has been updated to reflect the Court's rulings on those exhibits.¹

¹ For the exhibits that were admitted over the defense objections as contained in ECF No. 147, those objections are preserved for trial.

In addition, the defense has updated the list to reflect its objection (or non-objection) to exhibits that were not previously provided or were recently added. All of the updated objections are highlighted in yellow in order to facilitate the Court's review.

Exhibit #	Description	Court Ruling or Defense Position to New Exhibits
1.	Map—Washington state	Admitted
2.	Map—Seattle, Washington	Admitted
3.	Maps—Aurora Ave. area	Admitted
4.	Aerial photos—Aurora Ave. area	Admitted
5.	Photos—Aurora Ave. and 109 th St.	Admitted
6.	Photos—107 th St.	Admitted
7.	Drone video—Aurora Ave. area	Admitted
8.	Diagram—Overhead of Honda Pilot interior	No objection
9.	Audio—Two 911 calls from July 15, 2023	Admitted if Ms. Geary testifies
10.	Video—Sgt. Duval's body camera from July 15, 2023 at KFC in Klamath Falls	Admitted if AV1 testifies
11.	Images—Excerpts from Sgt. Duval's body camera at KFC	Admitted (government is removing 11-7, 11-8, and 11-9)
12.	Photos—KFC parking lot	Admitted
13.	Physical exhibit—Springfield XDM pistol	Admitted
14.	Physical exhibit—Magazine and 19 rounds of ammunition from Springfield pistol	Admitted
15.	Images—Excerpts from Sgt. Duval's body camera of AV1 at hospital	Admitted (government is removing 15-2)
16.	Photos—AV1's injuries, taken at hospital	Admitted
17.	Images—Excerpts from Ofc. Trippet's body camera of AV1 at hospital	Admitted

18.	Images—Excerpts from Ofes. Trippet's and Gilmore's body cameras of AV1 at 1336 N Eldorado	Admitted
19.	Photo—Blue woman's one-piece garment	Admitted
20.	Photo—Blue Puma sweatpants	Admitted
21.	Physical exhibit—Black woman's one-piece garment	Admitted
22.	Photo—Sketch drawn by AV1 of 1336 N Eldorado	Admitted
23.	Maps—Oregon and Klamath Falls area	Admitted
24.	Aerial photo—1336 N Eldorado	Admitted
25.	Photos—Eldorado Ave.	Admitted
26.	Video—Excerpt from Sgt. Fox' body camera at 1336 N Eldorado	Admitted (video only). Audio after initial entry to be muted.
27.	Drone video—1336 N Eldorado and area	No objection
28.	Photos—Front and garage area of 1336 N Eldorado	Admitted
29.	Photos—Rear of 1336 N Eldorado	Admitted
30.	Photos—Fenced area at 1336 N Eldorado	Admitted
31.	Photos—Outside garage side door entryway	Admitted
32.	Photos—Garage side door from inside garage	Admitted
33.	Photo—Garage and concrete structure	Admitted
34.	Photo—Concrete structure exterior	Admitted
35.	Photos—Concrete structure	Admitted
36.	Photos—Interior of concrete structure with chair and water bottles	Admitted
37.	Photo—Inside of concrete structure looking out	Admitted
38.	Photos—Metal security door and screen	Admitted

39.	Photo—Concrete structure showing door damage and blood	Admitted
40.	Photo—White door showing deadbolt	Admitted
41.	Photo—Deadbolt on white door from outside	Admitted
42.	Photo—Deadbolt on white door from inside	Admitted
43.	Photos—Door jamb area damage	Admitted
44.	Photo—Concrete structure ceiling	Admitted
45.	Photo—Concrete structure side wall	Admitted
46.	Photos—Concrete structure floor and stain	Admitted
47.	Removed by government	N/A
48.	Photos—Metal security door with placard V	Admitted
49.	Photos—Concrete structure door jamb with placard W	Admitted
50.	Photos—Concrete structure door/foam area, placard X	Admitted
51.	Photos—Outside of fence, placard A	Admitted
52.	Photos—Inside of fence, placards B and C	Admitted
53.	Photo—Garage in front of concrete structure	Admitted
54.	Photos—Garage workbench	Admitted
55.	Photos—Concrete structure doors with insulation, adhesive, and hanging metal screen	Admitted
56.	Photos—Insulation on exterior door	Admitted
57.	Photo—Concrete structure from exterior	Admitted
58.	Photos—Concrete structure interior and soundproofing	Admitted
59.	Photo—Concrete structure ceiling	Admitted
60.	Photos—Master bedroom and bed	Admitted

61.	Photo—Master bedroom closet and pistol case	Admitted
62.	Photo—Pistol case closeup	Admitted
63.	Photo—Paperwork for Prentice Smith in pistol case	Admitted
64.	Photos—Master bedroom closet with drawers	Admitted
65.	Photo—Firearm barrel and upper receiver	Admitted
66.	Photo—ID in master bedroom closet drawer	Admitted
67.	Photo—Check from Home Depot to Negasi Zuberi and check from tenant	Admitted (government is redacting portion)
68.	Photos—Ballistic vest and magazines on floor and bed	Admitted (government redacted 68-1 and 68-2)
69.	Photos—Home Depot receipts	Admitted
70.	Photo—Notebook with Prowler trailer folder	Admitted
71.	Photos—Backpack with passport of Negasi Zuberi and children in master bedroom	Admitted (government is removing 71-1 and renumbering 71-2)
72.	Photo—Name change decree	Admitted
73.	Photo—Metal ammunition can	Admitted
74.	Photo—Keys in metal ammunition can	Admitted
75.	Photo—Plastic ammunition can	Admitted
76.	Photos—Notepad in holder and contents; Operation Take Over and sketch	Admitted (redacted)
77.	Photo—Luggage with holster	Admitted (government has agreed to redact a portion)
78.	Photo—Master bedroom and seized items on bed	Admitted (government redacts ballistic vest)
79.	Photos—Exterior stairway on right side of house	Admitted
80.	Photo—Exterior window covered and blocks-right side of house	Admitted

81.	Photos—Exterior person doors to garage and house	Admitted
82.	Photo—Person door to garage, blood on doorknob	Admitted
83.	Photo—Person door to garage, view into garage	Admitted
84.	Photo—Garage-left side of garage	Admitted
85.	Photo—Curtain behind concrete structure	Admitted
86.	Photos—Purse in garage	Admitted
87.	Photos—Material on top of concrete structure	Admitted
88.	Photos—Garage fiberglass and insulation photo	Admitted
89.	Photo—Blue journal with leather cord on bed	Admitted
90.	Photos—Belongings of Prentice Smith in garbage bags	Admitted
91.	Photos—Prentice Smith’s passport, mail, and military identification tags	Admitted (government is removing 91-2)
92.	Videos—Det. Dougherty’s body camera from July 15, 2023, at 1336 N Eldorado	Admitted (government to mute audio except for initial portion)
93.	Diagram—Residence at 1336 N Eldorado	No objection
94.	Removed by government	N/A
95.	Diagram—Garage and location of items	No objection
96.	Removed by government	N/A
97.	Removed by government	N/A
98.	Removed by government	N/A
99.	Physical exhibit—Black notepad holder and notepad with Operation Take Over and drawing	Admitted
100.	Physical exhibit—Springfield pistol case in upstairs bedroom	Admitted

101.	Physical exhibit—Klamath Community College ID	Admitted
102.	Physical exhibit—U.S. passport in name of Justin Hyche	Admitted
103.	Physical exhibit—Blink camera	Admitted
104.	Physical exhibit—Ammunition can, plastic	Admitted
105.	Physical exhibit—Keys from metal ammunition can	Admitted
106.	Physical exhibit—Ammunition can, metal	Admitted
107.	Physical exhibit—Handcuffs in box from upstairs bedroom	Admitted
108.	Physical exhibit—Police patches from upstairs bedroom closet	Admitted
109.	Physical exhibit—Ballistic vest with three magazines	Admitted
110.	Physical exhibit—NY driver license—Justin Kouassi	Admitted
111.	Physical exhibit—Leg irons from garage workbench	Admitted
112.	Physical exhibit—Handcuffs from garage workbench	Admitted
113.	Physical exhibit—Key ring from garage workbench	Admitted
114.	Physical exhibit—Key ring from garage workbench	Admitted
115.	Physical exhibit—Purse in garage	Admitted
116.	Physical exhibit—White chair in concrete structure	Admitted
117.	Physical exhibit—Black metal door to concrete structure	Admitted
118.	Physical exhibit—Fiji water bottle from concrete structure	Admitted
119.	Physical exhibit—Deadbolt from concrete structure	Admitted

120.	Physical exhibit—Ammunition on and under workbench	Admitted
121.	Physical exhibit—Doorknob removed from garage door	Admitted
122.	Physical exhibit—Barrel and upper receiver for 6mm rifle	Admitted
123.	Physical exhibit—Metal security door	Admitted
124.	Physical exhibit—Flash drive from security system	Admitted
125.	Physical exhibit—Condoms from AV1's purse	Admitted
126.	Photo—Garage workbench	Admitted
127.	Photo—Deadbolt in box	Admitted
128.	Photo—Loaded curved magazine and three boxes of 7.62 ammunition on workbench	Admitted
129.	Photo—Closeup of magazine and boxes	Admitted
130.	Photo—Box of Remington 9mm Luger ammunition and magazine on workbench	Admitted
131.	Photo—Closeup of Remington ammunition box	Admitted
132.	Photo—New Frontier box	Admitted
133.	Photo—Blazer 9mm Luger ammunition box	Admitted
134.	Photo—Ammunition box under garage workbench	Admitted
135.	Photo—Closeup of Blazer ammunition box and bullets	Admitted
136.	Photo—Drill bit and parts	Admitted
137.	Photo—AR-15 lower parts kit	Admitted
138.	Photo—AR-15 lower drill instructions	Admitted
139.	Photo—AR-15 lower on garage floor	Admitted
140.	Photo—AR-15 lower closeup	Admitted
141.	Photo—USPS box to Negasi Zuberi	Admitted

142.	Photo—Contents of USPS box-5D Tactical	Admitted
143.	Photo—Firearm component in 5D Tactical box	Admitted
144.	Photo—Master bedroom drawer, left side of bed	Admitted
145.	Photo—Closeup of hard drive from left side drawer	Admitted
146.	Removed by government	N/A
147.	Photo—Master bedroom drawer, right side of bed	Admitted
148.	Photo—Closeup of right side drawer	Admitted
149.	Photo—Blue journal with leather cord on bed	Admitted
150.	Photo—Targets list and other writing from blue journal	Admitted (Redacted 150-3, 150-5, 150-6)
151.	Removed by government	N/A
152.	Photo—Desktop computer and camera	Admitted
153.	Removed by government	N/A
154.	Photo—Camera below television	Admitted
155.	Photo—48 Laws of Power and The Art of War books	Admitted (government to redact one book)
156.	Photo—Back side of concrete structure	Admitted
157.	Photo—Financial cards in name of Negasi Zuberi and Justin Kouassi	Admitted
158.	Photo—Inside of concrete structure, right side of door	Admitted
159.	Photo—Inside of concrete structure, right side of door, sheetrock removed	Admitted
160.	Photo—Inside of concrete structure, right side of door, insulation removed	Admitted
161.	Photo—Inside of concrete structure, left side of door, sheetrock removed	Admitted

162.	Photo—Inside of concrete structure, left side of door, insulation removed	Admitted
163.	Videos—Four videos of SA Gluesenkamp walking through the residence on July 19, 2023	Admitted to video (government will mute any audio, remove portion relating to children’s bedroom, and remove scene from the bathroom)
164.	Images—House interior layout and exterior excerpts from SA Gluesenkamp’s videos	Admitted (government to remove 164-17)
165.	Physical exhibit—Drywall from concrete structure	Admitted
166.	Physical exhibit—8 rounds of 9mm Blazer ammunition	Admitted
167.	Physical exhibit—3 boxes of Wolf 7.62 ammunition	Admitted
168.	Physical exhibit—Blue journal with leather cord and Targets list	Admitted
169.	Physical exhibit—25 round 6mm magazine	Admitted
170.	Physical exhibit—7.62 magazine	Admitted
171.	Physical exhibit—29 rounds of 7.62 ammunition	Admitted
172.	Physical exhibit—Two 6mm magazines	Admitted
173.	Physical exhibit—30 rounds of Hornady 6mm ammunition	Admitted
174.	Physical exhibit—Box of Remington 9mm ammunition	Admitted
175.	Physical exhibit—Deadbolt in box addressed to Sakima Zuberi	Admitted
176.	Map—Oregon and Nevada	Admitted
177.	Map—Reno area	Admitted
178.	Map—Reno Walmart	Admitted
179.	Images—Surveillance video excerpts Walmart in Reno	Admitted
180.	Video—Excerpt from Officer Albert’s body camera from Reno	Admitted [as to the version that was proposed after the defense objection]

181.	Video— Excerpts from Officer Staples’ body camera from Reno	Admitted [as to the version that was proposed after the defense objection]
182.	Video—Excerpts from Officer Broadway’s body camera from Reno -	Admitted [as to the version that was proposed after the defense objection]
183.	Video—Excerpts from TFO Griebel’s body camera from Reno	Admitted [as to the version that was proposed after the defense objection]
184.	Images—Excerpts from videos of traffic stop of Negasi Zuberi in Reno	Admitted
185.	Images—Excerpts from patrol car showing Negasi Zuberi in Walmart parking lot and with foot out	Admitted
186.	Images—Excerpts from patrol car showing Negasi Zuberi being arrested	Admitted
187.	Removed by government	N/A
188.	Removed by government	N/A
189.	Photos of exterior of Honda Pilot in Reno	Admitted (government to remove 189-3)
190.	Photos of blood and knife inside Honda Pilot	Admitted
191.	Image—Closeup of Negasi Zuberi’s face from body camera in Reno, NV	Admitted
192.	Transcript—Transcripts embedded in excerpts of Officers Broadway’s, Staples’, and Griebel’s body camera videos	Admitted subject to review of the transcripts and understanding that they will not go back with the jury.
193.	Photos—Honda Pilot	Admitted

194.	Photos—Interior of Pilot, driver and front passenger area	Admitted (government to remove 194-2, 194-3, 194-4)
195.	Photos—Honda Pilot interior middle row area	Admitted (government to remove 195-1, 195-3)
196.	Photo—Honda Pilot rear passenger seat	Admitted
197.	Removed	N/A
198.	Photos—Cell phone case found in Pilot and contents	Admitted
199.	Photos—Garmin GPS device found in Pilot	Admitted
200.	Photos—Pilot dash area and Loves receipt	Admitted
201.	Photos—Safeway receipt from July 14, 2023 found in Pilot	Admitted
202.	Photos—Home Depot receipt found in Pilot	Admitted
203.	Photos—Pilot ceiling sunglass pocket and vehicle registration papers	Admitted
204.	Photos—Pilot ceiling sunglass pocket and handcuff key	Admitted
205.	Photos—Pilot center console and RV Sales card and LandAirSea shipping receipt from console	Admitted
206.	Photos—Pilot console and 9mm bullet from console	Admitted
207.	Photos—Pilot door pocket and Dollar Tree receipt from July 15, 2023, for bleach and paper towels	Admitted
208.	Photo—Black backpack found in Pilot	Admitted
209.	Photos—Tire spikes found in backpack from Pilot	Admitted
210.	Photos—Negasi Zuberi’s U.S. passport, name change paperwork, and Social Security card and New York Driver License in name of Justin Kouassi	Admitted
211.	Photos—MacBook laptop from backpack found in Pilot	Admitted

212.	Photos—Contents of brown bag from Pilot with two cell phones, clothes, flashlight, binoculars and zip ties	Admitted
213.	Photos—Flashlight, binoculars and zip ties from brown bag from Pilot	Admitted
214.	Photos—Rear seat pocket and receipts from Pilot	Admitted
215.	Photos—Papers and aluminum foil on floor of Pilot	Admitted
216.	Photo—Cody’s Repair receipt from July 10, 2023	Admitted
217.	Photo—July 7, 2023, Aurora Ave. Safeway receipt from Pilot	Admitted
218.	Photo—Keys from Pilot	Admitted
219.	Photos—Dreamgirls at Rick receipt from July 7, 2023	Admitted
220.	Photos—Pilot center console area	Admitted
221.	Photos—Clothes in front passenger area of Pilot	Admitted
222.	Photo—Wine bottle in front passenger area of Pilot	Admitted
223.	Photos—Pilot middle row area and bleach cleaner	Admitted
224.	Photos—9mm casing in Pilot	Admitted
225.	Photos—Condom wrapper in Pilot	Admitted
226.	Removed by the government	N/A
227.	Photos—Home Depot receipt from June 30, 2023 from Pilot	Admitted
228.	Photos—Aluminum foil from Pilot	Admitted
229.	Removed by the government	N/A
230.	Photo—Charcoal toothpaste	Admitted
231.	Photos—Fiji water bottles	Admitted
232.	Photo—Sportsman’s Warehouse receipt	Admitted

233.	Removed by the government	N/A
234.	Removed by the government	N/A
235.	Physical exhibit—Negasi Zuberi’s cell phone and cover	Admitted
236.	Physical exhibit—Negasi Zuberi’s cell phone case and contents	Admitted
237.	Physical exhibit—AV1’s cell phone	Admitted
238.	Physical exhibit—Garmin GPS device	Admitted
239.	Physical exhibit—Handcuff key from sunglass pocket	Admitted
240.	Physical exhibit—Key chain with handcuff key	Admitted
241.	Physical exhibit—Spent 9mm casing	Admitted
242.	Physical exhibit—9mm bullet	Admitted
243.	Physical exhibit—Dollar Tree receipt	Admitted
244.	Removed by the government	N/A
245.	Physical exhibit— Negasi Zuberi’s U.S. passport; Social Security card and New York Driver License in name of Justin Kouassi	Admitted
246.	Physical exhibit—Flashlight, binoculars, zip ties and toiletries	Admitted
247.	Physical exhibit—Bleach cleaner bottle	Admitted
248.	Physical exhibit—Aluminum foil	Admitted
249.	Physical exhibit—Home Depot and shipping receipts	Admitted
250.	Removed by the government	N/A
251.	Physical exhibit—Alycia Westfall’s cell phone	Admitted
252.	Physical exhibit—Brown bag and contents	Admitted
253.	Physical exhibit—Bag with JC Penny’s receipt and clothing	Admitted

254.	Physical exhibit—Aluminum foil (x2)	Admitted
255.	Physical exhibit—Loves receipt	Admitted
256.	Physical exhibit—Partial condom wrapper	Admitted
257.	Video—Surveillance video from Portland, OR Safeway on July 14, 2023	Admitted
258.	Images—Excerpts from surveillance video from Portland, OR Safeway on July 14, 2023	Admitted
259.	Video—Surveillance video from Woodland, WA, Safeway on July 14, 2023	Admitted
260.	Images—Excerpts from surveillance video from Woodland, WA, Safeway on July 14, 2023	Admitted
261.	Video—Surveillance video from Klamath Falls Loves gas station on July 15, 2023	Hold for review
262.	Images—Excerpts from surveillance video from Klamath Falls Loves gas station on July 15, 2023	Admitted
263.	Videos—Negasi Zuberi and Honda Pilot in Tulelake, CA	Admitted
264.	Removed	N/A
265.	Removed	N/A
266.	Location data—LandAirSea data for Negasi Zuberi	Admitted
267.	Location data—Garmin data for the Honda Pilot and Negasi Zuberi from July 15, 2023 at 3:40:02	Admitted
268.	Location data—Cellphone handset data from Alycia Westfall's cell phone	Admitted
269.	Phone records—T-Mobile toll records for Negasi Zuberi	Admitted
270.	Digital file—CAST report from SA Kennedy regarding location data	Hold for review and will be subject to expert testimony
271.	Physical exhibit—CAST report	Hold for review and will be subject to expert testimony
272.	Photo—Hampton Landing area, Oregon	Admitted

273.	Photo—Shell Station, Halsey, Oregon	Admitted
274.	Map—Merrill Gas Station & Convenience Store	Admitted (amended version)
275.	Images—Surveillance video excerpts Merrill Gas Station & Convenience Store	Admitted
276.	Surveillance Video— Merrill Gas Station & Convenience Store (July 16, 2023)	No objection
277.	Photo—Nissan Altima	Admitted
278.	Photos—Home Depot receipt in Altima driver door pocket	Admitted
279.	Photos—AAA Discount storage paperwork and receipt	Admitted (as amended)
280.	Photos—Home Depot receipt in Altima passenger door pocket	Admitted
281.	Photo—Home Depot receipt	Admitted
282.	Photo—Concrete anchors	Admitted
283.	Photo—Honda paperwork and receipts	Admitted
284.	Physical exhibit—AAA Discount Storage paperwork and receipt	Admitted
285.	Physical exhibits—Home Depot receipts and return paperwork	Admitted
286.	Physical exhibit—Concrete anchors	Admitted
287.	Aerial photos—AAA Discount Storage and Home Depot area	Admitted
288.	Photos—Exterior of AAA Discount Storage	Admitted
289.	Photos—Inside AAA Discount Storage around area of Prowler trailer	Admitted
290.	Photos—Exterior of trailer	Admitted
291.	Photos—Trailer with door open	Admitted
292.	Photo—Taser, magazine and laptop inside trailer	Admitted
293.	Video—Interior of trailer	Admitted (government to mute audio)
294.	Photo—Pile of items by door	Admitted

295.	Photo—Back to front of trailer	Admitted
296.	Photo—Back of trailer	Admitted
297.	Photo—Front of trailer	Admitted
298.	Photo—Back and door area of trailer	Admitted
299.	Photo—Side of trailer bathroom	Admitted
300.	Photo—Trailer bathroom mirror	Admitted
301.	Photo—Negasi Zuberi and Alycia Westfall	Admitted
302.	Photos—Name change paperwork	Admitted (redacted 302-1)
303.	Photo—Plastic bag in trailer with used condoms	Admitted
304.	Photo—Bedding and cellphone jammer spike in trailer	Admitted
305.	Photo—Shotgun inside blanket in trailer	Admitted
306.	Photo—Shotgun in trailer	Admitted
307.	Photo—Shotgun and shotgun shell in trailer	Admitted
308.	Photo—Cellphone jammers on floor of trailer	Admitted
309.	Photo—Rifle in case on trailer bed	Admitted
310.	Photo—Trailer shelf	Admitted
311.	Photo—Aluminum foil and tape in trailer	Admitted
312.	Photos—Taser outside	Admitted
313.	Photo—Silver and black handcuffs outside	Admitted
314.	Photo—Backpack, cellphone jammers and handcuffs outside	Admitted
315.	Photo—Backpack inside with cellphone jammers, gloves, handcuffs and beanie	Admitted
316.	Photo—Cellphone jammers	Admitted (as amended)
317.	Photos—Plug in electronic device	Admitted
318.	Photos—Pistol holsters	Admitted

319.	Photos—AM-15 rifle	Admitted
320.	Photos—Remington rifle	Admitted
321.	Photos—Stoeger shotgun	Admitted
322.	Photos—Pistol magazines and ammunition	Admitted
323.	Photos—Rifle magazine and ammunition	Admitted
324.	Photo—Two shotgun shells	Admitted
325.	Photo—Charcoal toothpaste	Admitted
326.	Photo—Remington rifle box flap and receipts	Admitted
327.	Photo—Shipping label to Prentice Smith	Admitted
328.	Physical exhibit—AR-15 style rifle	Admitted
329.	Physical exhibit—Remington .308 rifle	Admitted
330.	Physical exhibit—Stoeger 12 GA shotgun	Admitted
331.	Physical exhibit—Magazines	Admitted
332.	Physical exhibit—Pistol holsters	Admitted
333.	Physical exhibit— Mesh backpack with gloves, beanie, handcuffs, antennas	Admitted
334.	Physical exhibit—Taser and cartridges	Admitted
335.	Physical exhibit—Black pair of handcuffs	Admitted
336.	Physical exhibit—Silver pair of handcuffs	Admitted
337.	Physical exhibit—12 GA ammunition	Admitted
338.	Physical exhibit—9mm ammunition	Admitted
339.	Physical exhibit—5.56 ammunition	Admitted
340.	Physical exhibit—Cell phone jammer-16 antenna	Admitted
341.	Physical exhibit—Cell phone jammer-8 antenna	Admitted
342.	Physical exhibit—Paperwork for firearms and accessories	Admitted

343.	Physical exhibit—Plug in electronic device	Admitted
344.	Removed	N/A
345.	Removed	N/A
346.	Removed	N/A
347.	Financial records—Key Bank	Admitted (government will replace with non-highlighted version)
348.	Financial records—Bank records from May 6, 2023, withdrawal of \$300	Admitted
349.	Online purchases—Amazon records	Admitted
350.	Online purchases—Excerpt of Amazon records	Admitted
351.	Surveillance Video—Home Depot (May 17, 2023 to July 2, 2023)	No objection subject to witness explaining what the timestamps are for each photo
352.	Documents—Receipts received from Home Depot	Admitted
353.	Photos—FBI Documenting concrete structure	Admitted
354.	Photos—Concrete structure measuring and construction, from iCloud account	Admitted
355.	Photos—Concrete structure deconstruction	Admitted
356.	Documents—Notes from garage clean up	Admitted (subject to witness who drafted it testifying about it)
357.	Documents—Klamath Falls landfill receipts	Admitted
358.	Video—Blink camera video of Alycia Westfall leaving, May 5, 2023	Admitted
359.	Image—Screenshot from video of Alycia Westfall leaving	Admitted
360.	Video—Blink camera video of Negasi Zuberi in kitchen, May 5, 2023 at 7:55 p.m.	Admitted
361.	Image—Screenshot from video of Negasi Zuberi in kitchen	Admitted

362.	Videos—Blink camera videos of Negasi Zuberi in kitchen, May 5, 2023 at 11:01 and 11:04 p.m.	Admitted
363.	Image—Screenshot from video of Negasi Zuberi leaving kitchen	Admitted
364.	Video—Blink camera video of male in kitchen talking on phone, May 6, 2023 at 12:58 a.m.	Admitted (subject to witness who is in video testifying to its contents)
365.	Videos—Blink camera videos of Negasi Zuberi in kitchen then walking towards garage with blanket, May 6, 2023 at 2:28 and 2:29 a.m.	Admitted
366.	Images—Screenshots from video of Negasi Zuberi in kitchen and walking towards garage	Admitted
367.	Videos—Blink camera videos of Zuberi holding a pistol, May 7, 2023	Admitted (government to remove all video of Ms. Westfall and child)
368.	Images—Screenshots from May 7, 2023 kitchen videos	Admitted (government will remove 368-1)
369.	Videos—Blink camera videos of Alycia Westfall and Mr. Zuberi talking in kitchen, May 7, 2023	Admitted (government will remove discussion of children's room)
370.	Video—Blink camera video of Negasi Zuberi holding a firearm part	Admitted
371.	Image—Screenshot from video of Negasi Zuberi holding a firearm part	Admitted
372.	Image—Screenshot from video of Negasi Zuberi holding a firearm upstairs	Admitted
373.	Removed	N/A *Objection was sustained to proposed exhibit*

374.	Messages-Negasi Zuberi and Alycia Westfall on July 15, 2023 regarding meeting	Admitted (government will redact)
375.	Messages-Negasi Zuberi and Alycia Westfall on July 16, 2023 regarding Merrill address	Admitted
376.	Removed by government	N/A
377.	Messages—Negasi Zuberi asking about acquiring taser, September 1, 2022	Admitted
378.	Removed by government	N/A
379.	Messages—Negasi Zuberi asking Tyler Archibald about constructing an underground concrete structure	Admitted
380.	Messages—Negasi Zuberi asking Tyler Archibald about what material is used for jail floors	Admitted
381.	Message—Negasi Zuberi sending Tyler Archibald an image of a cell phone jammers, December 28, 2022	Admitted
382.	Messages—Negasi Zuberi asking Tyler Archibald about building a concrete structure that a person can't break with their hands	Admitted
383.	Message—Negasi Zuberi telling Tyler Archibald that he has a pistol and including a picture	Admitted
384.	Message—Negasi Zuberi discussing trading firearms with a family member, and sending a picture of firearms	Admitted
385.	Video—Negasi Zuberi holding a pistol, from iCloud, November 28, 2022	Admitted
386.	Video—Negasi Zuberi with pistol, from iCloud	Admitted (government will remove audio)
387.	Video—Negasi Zuberi with pistol, from iCloud	Admitted (government will remove audio)

388.	Video—Negasi Zuberi saying and showing that he has an RV, Nov. 6, 2022	Admitted
389.	Removed by the government	N/A
390.	Video—Negasi Zuberi saying that he has the Honda back, from iCloud, June 27, 2023,	Admitted.
391.	Images—Screenshot of Dayton Tactical order for 80% AR-15 lower receiver from iCloud, October 22, 2022	Admitted
392.	Photos—Prowler trailer from iCloud account, November 15, 2022	Admitted
393.	Photo—Remington .308 rifle box label from iCloud account, November 17, 2022	Admitted
394.	Image—Screenshot from iCloud account of 32 round magazine for XD(M) 9mm from PistolGear, December 7, 2022	Admitted
395.	Photo—Springfield pistol on The Art of War book, from iCloud account, December 21, 2022	Admitted
396.	Removed	N/A *Objection was sustained to original objection*
397.	Photo—AAA Discount Storage paperwork from iCloud account, January 24, 2023	Admitted
398.	Image—Screenshot of cell phone jammer, from iCloud	Admitted
399.	Image—Screenshot of XDM pistol conversion kit, from Negasi Zuberi's iPhone, March 29, 2023	Admitted
400.	Photo—Firearms on bed, sent via message by Negasi Zuberi, March 29, 2023	Admitted
401.	Image—Screenshot of Google Maps use on iPhone, from iCloud account, May 6, 2023 at 1:20 a.m.	Admitted
402.	Digital files—Creation of contact in Negasi Zuberi's phone for Girl from Pikey	Admitted

403.	Image—Screenshot of payment to AAA Discount Storage by Negasi Zuberi, June 19, 2023	Admitted
404.	Digital file—Browser history from MacBook	Admitted
405.	Photo—Negasi Zuberi crying in Pilot in Reno, July 16, 2023, child’s face redacted	Admitted
406.	Removed	N/A *Objection to original exhibit sustained*
407.	Photo—Tule Lake, from iCloud, July 15, 2023	Admitted
408.	Photos—Taken from Honda Pilot in Reno on July 16, 2023	Admitted
409.	Photos—The Pikey exterior	No objection
410.	Photos—The Pikey interior	No objection
411.	Photo—AV2 and friends at The Pikey on May 5, 2023	Admitted
412.	Photos—AV2 and friend at The Pikey on May 5, 2023	Admitted
413.	Videos—AV2 and friend at The Pikey on May 5, 2023	Admitted
414.	Image—Screenshot of Negasi Zuberi’s Instagram taken by AV2	Admitted
415.	Video—Negasi Zuberi at The Pikey talking to male at pool table on May 6, 2023	Admitted (government agrees to mute audio)
416.	Video—Negasi Zuberi leaving The Pikey with male and female on May 6, 2023, at 12:53 a.m.	Admitted (government agrees to mute audio)
417.	Video—Negasi Zuberi walking up outside of The Pikey and leaving with AV2 on May 6, 2023, at 1:08 a.m.	Admitted to video (government agrees to mute audio)
418.	Images—Screenshots from surveillance video of Negasi Zuberi in and outside of The Pikey	Admitted
419.	Removed by government	N/A

420.	Photo—Sketch from AV2 of rural area	Admitted
421.	Photo—Sketch of garage by AV2	Admitted
422.	Photos—Chase Bank in Klamath Falls	Admitted
423.	Photos—AV2's former street and residence (include where dropped off)	Admitted
424.	Removed by government	N/A
425.	Photo—Clothes AV2 was wearing on May 5-6, 2023	Admitted
426.	Photos—Injury to AV2's face	Admitted
427.	Video—Injury to AV2's face	Admitted
428.	Image—Excerpt from video of Injury to AV2's face	Admitted
429.	Video—Excerpt from AV2 in interview room with KFPD and FBI on July 17, 2023	Objection – not admissible unless AV2 is impeached, and it qualifies as prior consistent statement
430.	Removed	N/A
431.	Removed	N/A
432.	Removed	N/A
433.	Removed	N/A
434.	Photos—HS Produkt Springfield XDM 9x19mm pistol	Admitted.
435.	Removed	N/A
436.	Photos—Anderson Manufacturing, Model AM-15, multi-caliber rifle	Admitted.
437.	Removed	N/A
438.	Photos—Firearm & Ammunition from Pilot (Count 4)	No objection
439.	Photos—Firearms & Ammunition from trailer (Count 5)	No objection

440.	Photos—Ammunition from bedroom (Count 6)	No objection
441.	Photos—Ammunition from garage (Count 7)	No objection
442.	Documents—Ammunition Storage components	Admitted
443.	Removed by government	N/A
444.	Documents—Limitless	Admitted
445.	Documents—Sportsman’s Warehouse Klamath Falls	Admitted
446.	Removed	N/A
447.	Removed	N/A
448.	Removed	N/A
449.	Removed	N/A
450.	Video—Demonstration of TASER Pulse	No objection subject to testimony of expert regarding video
451.	Documents—Item 107-1 from Item 107-Blue notebook from Rachel Clay’s file	Admitted
452.	Documents —Item 109-Notepad from 1336 North Eldorado Avenue from Rachel Clay’s file	Admitted
453.	Documents —Item 114-Court documents as known writing sample from Rachel Clay’s file	Admitted
454.	Documents —Item 115-Questioned Documents Secondary Evidence (5 electrostatic lifts) from Rachel Clay’s file	Admitted
455.	Video—Demonstration of Cell Phone Jammers by Shelby Quick (eight antennas)	Admitted
456.	Video—Demonstration of Cell Phone Jammers by Shelby Quick (sixteen antennas)	Admitted
457.	Documents —Negasi Zuberi’s prints from Stephanie Stewart’s file	Admitted

458.	Images—Prints from plastic bag from trailer at 2625 Unity Street (Item 8) from Stephanie Stewart's file	No objection
459.	Images—Prints from notepad holder with notepad from 1336 North Eldorado Avenue and one page (Items 109 & 109-1) from Stephanie Stewart's file	No objection
460.	Physical exhibit—representative swabs of DNA evidence	Admitted
461.	Audio recording—Negasi Zuberi and Alycia Westfall on July 23, 2023	No objection to redacted version/selection subject to original objection that Court overruled
462.	Audio recording—Negasi Zuberi and Alycia Westfall on July 28, 2023	No objection to redacted version/selection subject to original objection that Court overruled
463.	Audio recording—Negasi Zuberi and Alycia Westfall on July 28, 2023	No objection to redacted version/selection subject to original objection that Court overruled
464.	Removed by the government	N/A
465.	Audio recording—Negasi Zuberi and family member, on August 1, 2023 at 9:36 p.m. 12:02 (I told her) to 13:04 (they don't)	No objection to redacted version/selection subject to original objection that Court overruled
466.	Audio recording—Negasi Zuberi and Alycia Westfall on June 24, 2024 at 11:17 a.m. 2:01-4:19	No objection to redacted version/selection subject to original objection that Court overruled

467.	Transcripts—Transcripts embedded in excerpts of audio recordings of Negasi Zuberi	No objection subject to original objection that Court overruled and that they are not provided to the jury.
468.	Emails—Negasi Zuberi and Alycia Westfall, July 21, 2023	Admitted
469.	Removed by government	N/A
470.	Emails—Negasi Zuberi and Alycia Westfall, July 27, 2023	Admitted (government will redact)
471.	Emails—Negasi Zuberi and Alycia Westfall, July 28, 2023	Admitted (government will redact)
472.	Photo – AV1	Hold for review
473.	Documents—AAA Discount Storage Ledger and Rental Agreement	No objection
474.	Document—Rental Agreement for 1336 N Eldorado	No objection
475.	Videos—AV2 on May 6, 2023	No objection
476.	Images—Excerpts from AV2’s May 6, 2023 videos	No objection
477.	Messages—Negasi Zuberi and Brenden Westfall regarding rent	No objection
478.	Messages—Negasi Zuberi and Bradley Sticklin regarding wi-fi password	No objection (subject to objection to references to Army that Court previously overruled)
479.	Photos—Aurora Ave. at night	No objection
480.	Removed	N/A
481.	Photo—Maverick Motel in Klamath Falls	No objection
482.	Image—Screenshot of Honda Pilot in Tulelake	No objection
483.	Photos—Tulelake, California	No objection
484.	Map—Klamath Falls, Merrill, and Tulelake	No objection
485.	Photos—SANE exam of AV1	No objection subject to the SANE examiner testifying/authenticating

486.	Photos—Handcuffs and leg iron	No objection
487.	Photos—White streak marks in interior of Honda Pilot	Objection unless government establishes relevance through witness testimony
488.	Image—Screenshot of Alycia Westfall on July 15, 2023	No objection
489.	Removed	N/A
490.	Photo—LandAirSea trackers	No objection
491.	Physical exhibit—LandAirSea trackers	No objection
492.	Photos—Taser and cartridges	No objection
493.	Photos—FBI lab—Blue Puma sweatpants, used condom, handcuffs, one-piece garment and guns	No objection
494.	Document—Declaration of Jeff Byram	No objection
495.	Photos—1336 N Eldorado prior to being rented by Negasi Zuberi	No objection
496.	Photos—Neighbor’s house next to 1336 N Eldorado	Hold for review
497.	Removed	N/A
498.	Document—Rachel Clay’s handwriting presentation	Hold for review
499.	Audio recording—Negasi Zuberi on June 22, 2024	No objection
500.	Transcript—Audio recording on June 22, 2024	No objection
501.	Document—Diagram of location of items in Honda pilot	No objection
502.	Document—Diagram by Kori Barnum of 1336 Eldorado garage	No objection subject to witness testifying about its creation
503.	Document—Compilation of photos of AV1	No objection subject to SANE examiner testifying regarding SANE Exam photos that are contained on exhibit (See Exhibit 485)
504.	Document—Compilation of photos of AV2	No objection

505.	Document—Compilation of photos of cinderblock structure	No objection
506.	Document—Compilation of photos of writings	No objection [subject to original objection based on 404(b)/relevance that the Court has previously overruled]
507.	Document—Chart of DNA analysis—Items from 1336 Eldorado	No objection subject to DNA expert testifying/explaining
508.	Document—Chart of DNA analysis—Items from garage	No objection subject to DNA expert testifying/explaining
509.	Document—Chart of DNA analysis—Items from trailer	No objection subject to DNA expert testifying/explaining
510.	Document—Timeline of 2023 activity	No objection
511.	Document—Timeline of July 15/16, 2023 activity	No objection
512.	Document—Map of May 6, 2023 travel	No objection
513.	Document—Map of Klamath Falls locations	No objection
514.	Document—Map of July 12-14, 2023 travel	No objection
515.	Document—Map of July 14/15, 2023 travel	No objection
516.	Document—PowerPoint of Garmin and Alycia Westfall cell phone location data	No objection
517.	Transcript—911 call by Mellissa Geary on July 15, 2023	No objection
518.	Document—Compilation of photos of seized items	No objection

DATED September 25, 2024

Respectfully submitted,

s/ Amy E. Potter

Amy E. Potter
121 SW Morrison Street, Suite 400
Portland, OR 97204
Telephone: (503) 954-2232
Facsimile: (503) 227-0880

Attorney for Defendant